

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SOVEREIGN BANK,
PLAINTIFF

vs.

BOWDITCH BOAT HOLDINGS, LLC;
GOLDENEYE CORPORATION;
SALEM WHALE WATCH &
CRUISE CO. LLC; LAKE CHAMPLAIN
TRANSPORTATION CO.;
ROBERT E. BLAIR JR.;
ROBERT J. SALEM;
AND HENRY LORD


DEFENDANTS

Civil Action No. 05-10668 NMG

MOTION FOR LEAVE TO WITHDRAW APPEARANCE

Now comes undersigned counsel and moves that this honorable court allow the withdrawal of his firm in this matter as counsel for defendant Robert J. Salem. As grounds therefore, counsel states that successor counsel, Steve Ouellette, Esq. has already filed a Notice of Appearance in the above matter on behalf of Mr. Salem.

FLANAGAN & HUNTER, P.C.



Brian P. Flanagan
BBO# 547375
88 Black Falcon Avenue, Suite 274
Boston, MA 02210
617-482-3366

Certificate of Service

Certificate of Service

I hereby certify that on this 16 day of May 2005, I served a copy of the foregoing document by mailing a copy thereof, postage prepaid, to:

Meegan B. Casey, Esq.,
Reimer & Braunstein LLP
Three Center Plaza
Boston, MA 02108

Stephen M. Ouellette, Esq.
BBO No.: 543752
Cianciulli and Ouellette
163 Cabot Street
Beverly, MA 01915



Brian P. Flanagan
Attorney-at-Law

Stephen M. Ouellette, Esq.
Cianciulli and Ouellette
163 Cabot Street
Beverly, MA 01915

Meegan B. Casey, Esq.
Reimer & Braunstein
Three Center Plaza
Boston, MA 02108